



U.S. Department of Justice

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District of New Jersey
Civil Division

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May 8, 2023

VIA ECF

Hon. Cathy L. Waldor
Frank R. Lautenberg U.S. Post Office and Courthouse
2 Federal Square
Newark, NJ 07102

Re: *E.S. v. Essex County, New Jersey, et al.*, 21-cv-8512

Dear Judge Waldor:

I am the Assistant United States Attorney appearing on behalf of Government in connection with the Plaintiff's motion to compel in the above case . On March 30, 2023, Plaintiff filed a motion to compel the disclosure and release of records from the United States Attorney's Office concerning a former Essex County Corrections Officer, Shawn D. Shaw. Mr. Shaw was prosecuted by the U.S. Attorney's Office and found guilty of deprivation of rights and obstruction of justice. *See United States v. Shaw*, Case No. 13-cr-660 (ES) (D.N.J.)

The United States Attorney's Office is not a party to this matter. The Government has had multiple good faith discussions with Plaintiff's counsel and counsel for Essex County concerning the motion to compel. I respectfully request a 14-day extension of time, until May 22, 2023, to respond to Plaintiff's motion. We seek this extension to allow negotiations to continue with the hope that we may be able to moot out the motion. Plaintiff's counsel, Paul Faugno, Esq., consents to this request.

Thank you for considering this request.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Brooks E. Doyne
BROOKS E. DOYNE
Assistant United States Attorney

cc: Counsel of Record (*via* ECF)